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9 CHEVRON U.S.A. INC.,
a Pennsylvania corporation

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UNITED STATES DISTRICT COURT

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CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

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MARK SNOOKAL, an individual,

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Plaintiff,

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vs.

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CHEVRON USA, INC., a California Corporation,
and DOES 1 through 10, inclusive,

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Defendants.

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Case No. 2:23-cv-6302-HDV-AJR

**JOINT APPENDIX OF DECLARATIONS
AND WRITTEN EVIDENCE RE
DEFENDANT CHEVRON U.S.A. INC.’S
MOTION FOR SUMMARY JUDGMENT
OR, IN THE ALTERNATIVE, PARTIAL
SUMMARY JUDGMENT**

[Filed concurrently with Notice of Motion; Joint Brief re Defendant’s Motion for Summary Judgment; Defendant’s Statement of Uncontroverted Facts and Genuine Disputes; and [Proposed] Judgment granting Defendant’s Motion for Summary Judgment]

Hearing: May 8, 2025

Time: 10:00 a.m.

Place: Courtroom 5B – 5th Floor

Judge: Hon. Hernán D. Vera

Action Filed: August 3, 2023

Trial Date: August 19, 2025

1 **JOINT APPENDIX OF DECLARATIONS AND WRITTEN EVIDENCE**

2 Exhibit No.	3 Party	4 Description
5	6 Defendant	7 Declaration of Dr. Scott Levy
8 A	9 Defendant	10 MSEA Location Clusters Table
11 B	12 Defendant	13 August 23, 2019 Email from Dr. Khan re Plaintiff's heart condition
14	15 Defendant	16 Declaration of Dr. Eshiofe Asekomeh
17 C	18 Defendant	19 Expatriate Exam Recommendations
20	21 Defendant	22 Declaration of Andrew Powers
23 D	24 Defendant	25 Chevron U.S.A.'s Equal Employment Opportunity Policy (HR Policy 400)
26	27 Defendant	28 Declaration of Robert E. Mussig
29 E	30 Defendant	31 Excerpts from the Transcript of Plaintiff's Deposition, taken on May 10, 2024
32 E-1	33 Defendant	34 Plaintiff's Expatriate Assignment Offer
35 E-3	36 Defendant	37 Medical Suitability for Expatriate Assignment History & Physical Examination
38 E-4	39 Defendant	40 July 29, 2019 doctor's note
41 E-5	42 Defendant	43 Expatriate Exam Recommendations
44 E-6	45 Defendant	46 August 29, 2019 email from S. Levy re Patient MS
47 E-7	48 Defendant	49 September 16, 2019 email from S. Levy re medical
50 E-8	51 Defendant	52 September 6, 2019 email from A. Powers re Rescinded Job Offer in Nigeria
53 E-10	54 Defendant	55 September 5, 2019 email from A. Ruppert re Positions in 2H PDC
56 E-12	57 Defendant	58 Job Description for El Segundo Operating Assistant
59 E-17	60 Defendant	61 Plaintiff's resignation letter
62 E-18	63 Defendant	64 Plaintiff's termination paperwork
65 E-19	66 Defendant	67 Plaintiff's Exit Interview
68 F	69 Defendant	70 Excerpts from the Transcript of Dr. Eshiofe Asekomeh's Deposition, taken on October 10, 2024

Exhibit No.	Party	Description
G	Defendant	Excerpts from the Transcript of Dr. Scott Levy's Deposition, taken on August 30, 2024
H	Defendant	Excerpts from the Transcript of Andrew Powers's Deposition, taken on September 17, 2024
I	Defendant	Excerpts from the Transcript of Dr. Shahid Hameed Khan's Deposition, taken on February 10, 2025
J	Defendant	Excerpts from the Transcript of Dr. Ujomoti Akintunde's Deposition, taken on October 31, 2024
	Plaintiff	Declaration of Plaintiff Mark Snookal
1	Plaintiff	July 1, 2019 "Assignment Offer" letter
2	Plaintiff	July 24, 2019 MSEA exam of Mr. Snookal completed by Dr. Sobel
3	Plaintiff	July 29, 2019 letter from Dr. S. Khan Re: Mr. Snookal
4	Plaintiff	August 15, 2019 "Expatriate Exam Recommendations"
5	Plaintiff	August 23, 2019 and August 26, 2019 email thread between Dr. Khan and Dr. Levy Re: Mr. Snookal
6	Plaintiff	September 4, 2019 through September 6, 2019 email thread regarding Mark Snookal's disability discrimination complaint
7	Plaintiff	Chevron's "Physical Requirements and Working Conditions GO-308" for the REM Position
8	Plaintiff	September 16, 2019 email from Dr. Levy to Mr. Snookal
9	Plaintiff	August 4, 2021 letter of resignation from Mark Snookal
10	Plaintiff	"Voluntary Termination" Paperwork
	Plaintiff	Declaration of Dr. Alexander Marmureanu
11	Plaintiff	Expert Report of Dr. Alexander Marmureanu
	Plaintiff	Declaration of Olivia Flechsig
12	Plaintiff	Excerpts from the Transcript of Scott Levy, M.D.'s Deposition, taken on August 30, 2024
12-C	Plaintiff	August 23, 2019 E-mail from Dr. Khan to Dr. Levy

Exhibit No.	Party	Description
12-D	Plaintiff	September 16, 2019 E-mail from Dr. Levy to Mr. Snookal
12-E	Plaintiff	Expatriate Assignment History & Physical Examination Form for REM Position
13	Plaintiff	Excerpts from the Transcript of Dr. Ujomoti Akintunde's Deposition taken on October 31, 2024
14	Plaintiff	Excerpts from the Transcript of Dr. Victor Adeyeye's Deposition taken on November 15, 2024
15	Plaintiff	Excerpts from the Transcript of Shahid Hameed Khan, M.D.'s Deposition taken on February 10, 2025
	Plaintiff	Declaration of Dolores Y. Leal
16	Plaintiff	Excerpts from the Transcript of Plaintiff Mark Snookal's Deposition, taken on May 10, 2024
17	Plaintiff	Excerpts from the Transcript of Andrew Powers Deposition, taken on September 17, 2024
17-3	Plaintiff	September 4, 2019 Email from Mark Snookal to Human Resources Manager Andrew Powers (CUSA000538- CUSA000540)
17-5	Plaintiff	Andrew Powers Email to Mark Snookal Re: Medical Team Findings (CUSA000542- CUSA000543)
17-12	Plaintiff	Email from Andrew Powers to medical team in Nigeria (CUSA000650-CUSA000651)
18	Plaintiff	Excerpts from the Transcript of Dr. Eshiofe Asekomeh's Deposition, taken on October 10, 2024
18-2	Plaintiff	Job Description for NMA EGTL Reliability Engineering Manager (SNOOKAL-01157-SNOOKAL-01158)
18-7	Plaintiff	Dr. Asekomeh email thread with Nigerian cardiologists regarding Mark Snookal's medical report (CUSA000768-CUSA000774)
19	Plaintiff	Excerpts from the Transcript of Thalia Tse's Deposition, taken on September 13, 2024

Exhibit No.	Party	Description
20	Plaintiff	Andrew Powers' September 6, 2019 Email to Mark Snookal Re: Disability Complaint Findings (CUSA000644)
21	Plaintiff	September 4, 2019 Email from Andrew Powers Re: the Rescinded Job Offer in Nigeria (CUSA0000538-540)
22	Plaintiff	September 6, 2019 Email from Andrew Powers to Mark Snookal Re: the Rescinded Job Offer in Nigeria (CUSA0000542-543)
23	Plaintiff	September 4, 2019 Emails Re: the Rescinded Job Offer in Nigeria (CUSA0000650-651)
24	Plaintiff	Defendant, CUSA's Responses to Plaintiff Mark Snookal's Interrogatories Nos. 20-24
25	Plaintiff	Defendant CUSA's Response to Plaintiff Mark Snookal's Interrogatory No. 26
26	Plaintiff	Defendant CUSA's Response to Plaintiff Mark Snookal's Interrogatory No. 33
27	Plaintiff	August 15, 2019 Email from Dr. Pitan to Dr. Asekomeh (CUSA-0000824-0000827)
28	Plaintiff	Escravos Medevac Records for 2017-2022 (CUSA0000830-0000836)
29	Plaintiff	September 4, 2019 Emails Re: Mark Snookal's Rescinded Job offer in Nigeria (CUSA0000983-985)
30	Plaintiff	July 9, 2019 email from Chevron to Mark Snookal Re: New Assignment (CUSA0000986-0000988)
31	Plaintiff	August 26, 2019 Emails Between Dr. Areanya and Dr. Levy Re: Mark Snookal (CUSA0000995-0000997)
32	Plaintiff	August 20, 2019 Email from Dr. Frangos to Dr. Levy and Dr. Areanya Re: Nigeria Medical Determination (CUSA0001003-0001006)
33	Plaintiff	August 23, 2019 Email from Dr. Levy to Eldyleida Seca Torres Re: Msea (CUSA0001041)

Exhibit No.	Party	Description
34	Plaintiff	August 23, 2019 Email from Dr. Khan to Dr. Levy Re: Mark Snookal (CUSA0001042-0001043)
35	Plaintiff	September 5, 2019 Emails Re: Nigeria Medical Determination (CUSA0001236)
36	Plaintiff	June 6, 2019 Email recommending Mark Snookal for the Reliability Engineering Manager position (CUSA0001435-1438)
37	Plaintiff	Summary of Cardiology Opinions – NMA Cardiologists and Emails Re: Mark Snookal's Medical Report (CUSA0001520-CUSA0001525)
38	Plaintiff	August 7, 2019 Email from Dr. Asekomeh to Dr. Pitan Re: Mark Snookal's Medical Summary (CUSA0001526-0001527)
39	Plaintiff	The screenshot collected on or about November 11, 2024 of Dr. Stephen Frangos' public LinkedIn page.

Dated: March 27, 2025

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By _____
/s/ Tracey A. Kennedy
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